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March 17, 2016

By ECF

Magistrate Judge Debra Freeman
Unites States Magistrate Judge
Southern District of New York
500 Pearl St.
New York, New York 10007

Re: Schoolcraft v. City of New York, et al.
10-CV-6005 (RWS)

Your Honor:

I am a Senior Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, representing the motion respondent City of New York (the "City"), in connection with the above-captioned matter.

I write with the following logistical requests for relief relating to the fee settlement conference with Your Honor on March 22, 2016. All of the plaintiff's counsel groups have consented to these requests.

First, we respectfully request an enlargement of the page limits in Your Honor's individual practices for the letter submission, from five pages to ten pages, excluding exhibits. This is necessary because there are several legal and factual matters relating to the fee application as a whole as well as the three distinct counsel groups. We believe that a minimum of 10 pages is required for an adequate submission addressing the important facts relating to the fee application of over 5,000 entries and the principal legal issues. (Even 10 pages is a difficult fit.)

Second, we respectfully request permission to make the submission to Your Honor by email and/or by online drop box.

Third, we respectfully request an order permitting the attending counsel to bring electronic equipment to the conference in the form of a laptop, cell phone (including an iPhone), and/or tablet. A proposed order for the City's counsel is attached.

We thank the Court for its consideration of this matter.

Respectfully submitted,

/s/

Alan H. Scheiner
Senior Counsel

cc: All Counsel by ECF